

EXHIBIT 2

From: Freedman, John A.
Sent: Monday, November 12, 2018 5:16 PM
To: Tomlinson, Martin M. (CIV); Wells, Carlotta (CIV); Gardner, Joshua E (CIV); 'Bailey, Kate (CIV)'
Cc: 'Colangelo, Matthew'; Goldstein, Elena; dale.ho@aclu.org; Gersch, David P.; zzz.External.SBrannon@aclu.org
Subject: New York v. DOC, 18-cv-2921

Counsel --

We are in receipt of your demonstratives for use tomorrow.

1. Please advise where the opinions and underlying facts for DDX-25 were disclosed in Dr. Abowd's September 21 expert disclosure?
2. Please advise where in the September 21 expert disclosure Dr. Abowd analyzed any of the analysis from the Mule memo (G-01)?
3. Please advise when you produced the "Abowd's calculations" referenced in the source line?

Thanks,

John

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